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PATENT
Attorney Docket No. 021756-012100US
Client Ref. No. OID-2005-162-13

TOWNSEND and TOWNSEND and CREW LLP

By: /Joni E. Peterson/
Joni E. Peterson

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re application of:

Chi-Cheng Lee et al.

Application No.: 09/998,908

Filed: November 30, 2001

For: SUPPORT FOR MULTIPLE DATA
STORES

Customer No. 51206

Confirmation No. 4166

Examiner: Thanh T. Nguyen

Technology Center/Art Unit: 2144

APPELLANTS' REPLY BRIEF UNDER
37 CFR §41.41

Via EFS-Web

Mail Stop Appeal Brief - Patents

Commissioner for Patents

P.O. Box 1450

Alexandria, VA 22313-1450

Sir:

The Appellants offer this Reply Brief in response to the Examiner's Answer mailed on June 19, 2007 and the Supplemental Examiner's Answer mailed on July 30, 2007. The following remarks are intended to further focus the issues in this appeal.

The section of the Examiner's Answer captioned "Grounds of Rejection" is a reproduction of portions of the Final Office Action. This is supplemented by a separate section captioned "Response to Argument" in which the arguments of the Appeal Brief are addressed. However, in that section, the Examiner does not provide a detailed response to the arguments made in the Appeal Brief other than to assert that the arguments are vague. Rather than restate these arguments in total here, the Appellants refer to the detailed arguments provided on pages 9-15 of the Appeal Brief and provide the following summary of some of the points made therein.

The appellants respectfully maintain that a *prima facie* case of obviousness has not been established in rejecting these claims. More specifically, the cited references fail to teach or suggest, alone or in combination, each claimed limitation. For example, none of the references, alone or in combination, teach or suggest: 1) multiple data stores each having an agent and a profile representing configuration information for the data store; 2) agents and profiles being mapped one-to-one; 3) creating a temporary proxy; or 4) accessing a data store via the associated agent from the temporary proxy based on the profiles.

As explained in detail in the Appeal Brief, Hassett does not teach or suggest multiple data stores each having an agent and a profile representing configuration information for the data store, the agents and profiles being mapped one-to-one, creating a temporary proxy, or accessing a data store via the associated agent from the temporary proxy based on the profiles. Furthermore, the final Office Action concedes that Hassett does not teach "each data store having a dedicated agent for interacting with the data store and a profiles (sic) mapping one-to-one with the dedicated agent and representing configuration information for the data store." (page 3, para. no. 5, last sentence)

The final Office Action relies on Bull to demonstrate this element. However, the Appellants respectfully maintain that Bull also fails to teach or suggest, alone or in combination with Hassett or any of the other references, multiple data stores each having an agent and a profile representing configuration information for the data store, the agents and profiles being mapped one-to-one, creating a temporary proxy, or accessing a data store via the associated agent from the temporary proxy based on the profiles. As discussed in detail in the Appeal Brief on pages 10 and 11, the agents of Bull provide for monitoring of a user's actions and, when a certain pattern is detected, provide a targeted advertisement. (Col. 4, line 62 - col. 5, line 10) The portion of Bull cited by the Office Action, i.e., col. 14, lines 21-32, actually describes a data store in which such agents can be stored. However, the functions of the agents remain monitoring a user's actions and providing a target advertisement based thereon, not using the agents to access the data store. Furthermore, Bull does not teach or suggest each data store having an agent. For example, Bull does not teach or suggest the "lead data store" of FIG. 3

having an agent for accessing that store. Thus, the profiles of Bull are related to individual users, not the individual data stores. Furthermore, the agents of Bull monitor the actions of the user and provide a targeted advertisement based thereon but they do not provide access to an associated data store.

Furthermore, neither Krapf, nor Brown, alone or in combination with Hassett or Bull, teach or suggest these elements. That is, neither Krapf nor Brown teach or suggest multiple data stores each having a agent and a profile representing configuration information for the data store, the agents and profiles being mapped one-to-one, creating a temporary proxy, or accessing a data store via the associated agent from the temporary proxy based on the profiles. Rather, as described in detail on pages 11 and 15 of the Appeal Brief, Krapf teaches porting software between environments or domains using a proxy to encapsulate the ported component while Brown teaches providing access to controlled resources based on a ticket or key provided by a client.

Thus, the Appellants submit that clear, detailed arguments have been presented distinguishing the pending claims from the cited references. Furthermore, based on these distinctions, the Appellants maintain that a *prima facie* case of obviousness has not been established in rejecting these claims. For at least these reasons, it is respectfully submitted that the rejection should be reversed.

Dated: August 20, 2007

Respectfully submitted,

/William J. Daley/
William J. Daley
Reg. No. 52,471

TOWNSEND and TOWNSEND and CREW LLP
Two Embarcadero Center, Eighth Floor
San Francisco, California 94111-3834
Tel: (303)571-4000 (Denver)
Fax: (415) 576-0300
61127686 v1